

KAUFMAN BORGEESE & RYAN LLP

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Attorneys for Hartford Fire Insurance Company

**UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF NEW JERSEY**

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VALEANT PHARMACEUTICALS	:
INTERNATIONAL, INC.; VALEANT	:
PHARMACEUTICALS INTERNATIONAL; and	:
AGMS, INC.,	:
	:
Plaintiffs,	:
	:
v.	:
	: Civil Action. No:
AIG INSURANCE COMPANY OF CANADA;	: 3:18-CV-00493 (MAS) (LHG)
ACE INA INSURANCE COMPANY; ALLIANZ	:
GLOBAL RISKS US INSURANCE COMPANY;	:
ARCH INSURANCE CANADA LTD; EVEREST	:
INSURANCE COMPANY OF CANADA;	: HARTFORD FIRE INSURANCE
HARTFORD FIRE INSURANCE COMPANY;	: COMPANY'S NOTICE OF AND
IRONSHORE CANADA LTD; LIBERTY	: JOINDER IN ALLIANZ GLOBAL
INTERNATIONAL UNDERWRITERS, a division	: RISKS US INSURANCE COMPANY'S
of LIBERTY MUTUAL INSURANCE	: MOTION TO COMPEL
COMPANY; and LIBERTY MUTUAL	: PRODUCTION OF SETTLEMENT
INSURANCE COMPANY; LLOYD'S	: AGREEMENT(S)
UNDERWRITERS; LLOYD'S CONSORTIUM	:
9885 (a/k/a STARR FINANCIAL LINES	:
CONSORTIUM 9885); LLOYD'S SYNDICATE	:
ANV 1861; LLOYD'S SYNDICATE AMA 1200;	:
LLOYD'S SYNDICATE ARGO 1200; LLOYD'S	:
SYNDICATE AWH 2232; LLOYD'S	:
SYNDICATE BRT 2987; LLOYD'S SYNDICATE	:
CVS 1919; LLOYD'S SYNDICATE HCC 4141;	:
LLOYD'S SYNDICATE MITSUI 3210;	:

LLOYD’S SYNDICATE MIT 3210; LLOYD’S :
 SYNDICATE NAV 1221; LLOYD’S :
 SYNDICATE QBE 1886; LLOYD’S :
 SYNDICATE SJC 2003; ROYAL & SUN :
 ALLIANCE INSURANCE COMPANY OF :
 CANADA; TEMPLE INSURANCE COMPANY :
 and XL INSURANCE COMPANY SE., :
 :
 :
 Defendants. :

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PLEASE TAKE NOTICE THAT Defendant Hartford Fire Insurance Company (“Hartford”) hereby joins (this “Joinder”) in the Motion to Compel Production of Settlement Agreement(s) (ECF No. 303) and the Memorandum of Law in Support of the Motion to Compel (ECF No. 303-2) filed by Allianz Global US Insurance Company (“Allianz”) on April 19, 2022 (the “Motion to Compel”).

As set forth in Allianz’s Motion to Compel, which is adopted and incorporated as if fully set forth herein, Hartford respectfully requests that the Court grant the Motion and Compel the production of the settlement agreements(s) that Plaintiffs Valeant Pharmaceuticals International, Inc., Valeant Pharmaceuticals International, and AGMS, Inc. entered into with Defendant AIG Insurance Company of Canada and with Defendants Certain Underwriters at Lloyd’s, London Subscribing to Policy Number QB078513 and/or Allied World Assurance Company.

Dated: Valhalla, New York
April 20, 2022

Respectfully submitted,

KAUFMAN BORGEEST & RYAN LLP

By: _____

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 20th day of April 2022, a true copy of Defendant Hartford Fire Insurance Company's Notice of and Joinder in Defendant Allianz Global US Insurance Company's Motion to Compel, was filed and served upon all counsel of record through the Court's ECF system.



Briana A. Semenza